

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Advanced Television System ) MM Docket No. 87-268  
and Their Impact upon the )  
Existing Television Broadcast )  
Service ) DOCKET FILE COPY ORIGINAL

Comments of California State Automobile Association

The California State Automobile Association (CSAA), by its attorney, hereby submits its comments on the proposed reallocation of spectrum pursuant to the Commission's proposal to implement digital television (DTV) service, in MM Docket No. 87-268. CSAA has serious concerns about the possibility of interference to its land mobile operations on TV Channel 17 frequencies if the Commission moves ahead with its proposal to assign TV Channels 18 and 19 in the San Francisco area for high power DTV service. The proposed reallocation would place broadcast operations at extreme power levels (up to 4 megawatts) on frequencies adjacent to CSAA's low power land mobile operations used in connection the provision of valuable, safety-related automobile emergency services.

The Commission's proposal appears to give substantial consideration to the required separation between co-channel and adjacent channel NTSC and DTV stations, so that no harmful interference will result. However, the same consideration does not appear to have been given to protect land mobile operations that are used for public safety and other applications. The Commission

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states that "we believe that there are engineering solutions available to handle any adjacent channel interference concerns between land mobile and DTV." Sixth FNPRM at para. 93. Because the Commission does not propose specific rules to adequately protect land mobile operators, this statement provides little comfort. The required separations between TV and land mobile stations reflected in Rule Sections 90.301 et Seq. were developed years ago and have generally proven to provide acceptable interference protection. See, e.g., First Report And Order, Docket No. 18261, Mimeo No. 46892, released May 21, 1970, at paras. 32-52. To abandon those standards now, without providing a technical basis for the Commission's assertion that the plan is workable, places the land mobile community in an untenable situation. Even if technical solutions are available, the Commission has not indicated at what cost, or who will pay those costs. Land mobile stations that have operated for many years without causing interference to broadcast operations should not now be expected to bear the cost of providing yet another TV station in the immediate vicinity. The Commission should therefore use the tables in Rule Section 90.309 as a standard for protection to existing land mobile operations from television operations and vice versa.

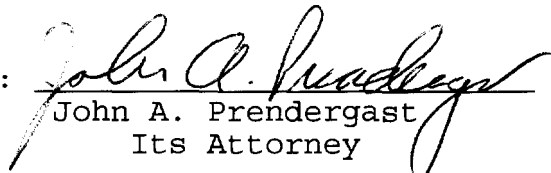
CSAA's radio operations allows its automobile emergency response vehicles to be quickly dispatched to the scene of a severe accident or stranded motorist, so that the hazard can be quickly removed, the motorist transported to safety, and further injury to

other motorists prevented. CSAA is also aware that the Santa Clara County Sheriff's Department and other public safety entities utilize the spectrum adjacent to Channel 18 and 19. While we all look forward to the benefits in entertainment which would be brought about by DTV, these benefits should not come at the cost of public safety. Indeed, the use of radio for safety purposes is identified as one of the overriding public interest goals of the Communications Act in the very first section thereof. 47 U.S.C. § 151.

In light of the foregoing, it is respectfully requested that the Commission refrain from allocating Channel 18 and 19 for high powered use in the San Francisco Area, and otherwise take steps to ensure that land mobile operations are protected from adjacent channel interference due to the reallocation plan to be adopted in this docket.

Respectfully Submitted,

**CALIFORNIA STATE AUTOMOBILE  
ASSOCIATION**

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